

Nancy M. Erfle, OSB No. 902570
nerfle@grsm.com
W. Gregory Lockwood, OSB No. 114415
wglockwood@grsm.com
GORDON REES SCULLY MANSUKHANI, LLP
1300 SW Fifth Avenue, Suite 2000
Portland, OR 97201
Telephone: (503) 222-1075
Facsimile: (503) 616-3600

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

VICTORIA BORDELON,

Plaintiff,

vs.

AIRGAS USA, LLC; and FRANK DOHERTY, an
individual,

Defendants.

Case No: 3:20-cv-02037-IM

**DECLARATION OF GREG
LOCKWOOD IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Greg Lockwood, declare as follows:

1. I represent Defendants Airgas USA, LLC and Frank Doherty in the above-captioned matter. I make this statement based on my personal knowledge.
2. Attached hereto as Exhibit A is a true and correct copy of the deposition transcript excerpts from the deposition of Frank Doherty. Based on the certification of the Court reporter, it is self-authenticating.
3. Attached hereto as Exhibit B is a true and correct copy of the medical exam for Frank Doherty from the Department of Transportation. This document was produced in discovery and is kept and maintained by Airgas in the ordinary course of business.

**DECLARATION OF GREG LOCKWOOD
IN SUPPORT OF DEFENDANT'S MOTION
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4. Attached hereto as Exhibit C is a true and correct copy of the Portland Police report concerning the crash on October 22, 2018. It was produced in discovery by both parties.

5. Attached hereto as Exhibit D is a true and correct copy of the October 26, 2021 rebuttal report from Gregory Stephens, Research Engineer.

6. Attached hereto as Exhibit E are true and correct copies of medical records from Doherty's treatment at OHSU immediately following the accident. These records were produced in discovery.

7. Attached hereto as Exhibit F is a true and correct copy of the July 29, 2021 report from Marko Yakovlevitch, M.D., Board Certified Cardiologist, regarding Frank Doherty. The report is self-authenticating.

8. Attached hereto as Exhibit G is a true and correct copies of the American Medical Response records from Bordelon's ambulance ride, which were produced by Plaintiff in this case and are statements of medical diagnosis.

9. Attached hereto as Exhibit H are true and correct copies of the medical records from Bordelon's treatment at Legacy Hospital immediately following the accident, which were produced by Plaintiff in this case and are statements of medical diagnosis.

10. Attached hereto as Exhibit I is a true and correct copy of the deposition transcript excerpts from the deposition of Victoria Bordelon. It is self-authenticating.

11. Attached hereto as Exhibit J are true and correct copies of records from Bordelon's treatment at Cashion Chiropractic, which were produced by Plaintiff in this case and are statements of medical diagnosis.

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**DECLARATION OF GREG LOCKWOOD
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12. Attached hereto as Exhibit K are true and correct copies of Bordelon's records from Providence Medical Group and Legacy Emanuel Emergency Department, which were produced by Plaintiff in this case and are statements of medical diagnosis.

13. Attached hereto as Exhibit L are true and correct copies of photos of Bordelon throwing an axe, which were produced by Plaintiff in this case.

14. Attached hereto as Exhibit M are true can correct copies of records of Bordelon's calendar and personal training records, which were produced by Plaintiff in this case.

15. Attached hereto as Exhibit N are true and correct copies of the records from Bordelon's treatment at ATI Physical Therapy, which were produced by Plaintiff in this case and are statements of medical diagnosis.

16. Attached hereto as Exhibit O are true and correct copies of records from Bordelon's treatment at Benchmark Physical Therapy, which were produced by Plaintiff in this case and are statements of medical diagnosis.

17. Attached hereto as Exhibit P is a true and correct copy of the expert report prepared by Daniel Mangum, D.O. It is self-authenticating.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF OREGON THAT THE FOREGOING IS TRUE AND CORRECT

Dated: November 12, 2021

GORDON REES SCULLY MANSUKHANI, LLP

By: s/ W. Greg Lockwood
W. Gregory Lockwood, OSB No. 114415
wglockwood@grsm.com
Attorneys for Defendants

**DECLARATION OF GREG LOCKWOOD
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